

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

TELEBRANDS CORPORATION,

Plaintiff,

v.

BHSD TRADING LLC,

Defendant.

Civil Action No. 1:23-cv-00225-MAD-CFH

Judge Mae A. D'Agostino  
Magistrate Judge Christian F. Hummel

**[PROPOSED] ORDER GRANTING PLAINTIFF TELEBRANDS CORPORATION'S  
MOTION FOR DAMAGES, PRE- AND POSTJUDGMENT INTEREST, AND COSTS**

Having reviewed the briefing in connection with Plaintiff Telebrands Corporation's Motion for Damages, Pre- and Postjudgment Interest, and Costs, the Court hereby:

**ORDERS** that Plaintiff Telebrands Corporation's Motion for Damages, Pre- and Postjudgment Interest, and Costs is **GRANTED**;

**ORDERS** that the Clerk is directed to enter a judgment of \$10,902,390.30 of monetary damages, pre-judgment interest, and costs in Plaintiff Telebrands Corporation's favor and against BHSD Trading LLC. This judgment will further specify that this judgment will be subject to post-judgment interest at the state statutory rate of 9 percent per annum from the date of service of the judgment on Defendant BHSD Trading LLC until such judgment is paid in full.

**ORDERS** that all monies, up to the above-identified damages award currently contained in Defendant BHSD Trading LLC's financial accounts, including monies held by third party providers, including Amazon, PayPal, Meta, and Shopify be released to Plaintiff Telebrands Corporation to satisfy at least a portion of the damages award sought by Plaintiff Telebrands Corporation.

Plaintiff Telebrands Corporation may serve this Order on third party providers, including Amazon, PayPal, Meta, and Shopify, by e-mail delivery or other authorized means.

Any third party providers holding funds for Defendant BHSD Trading LLC, including Amazon, PayPal, Meta, and Shopify, shall, within ten (10) business days of receipt of this Order, permanently restrain and enjoin any financial accounts connected to BHSD Trading LLC's Aliases or Online Marketplaces from transferring or disposing of any funds, up to the above-identified damages award, or other of BHSD Trading LLC's assets.

All monies, up to the above-identified damages award, currently contained in Defendant BHSD Trading LLC's financial accounts, including monies held by third party providers, including Amazon, PayPal, Meta, and Shopify, are hereby released to Plaintiff Telebrands Corporation as partial payment of the above-identified damages, and third party providers, including Amazon, PayPal, Meta, and Shopify, are ordered to release to Plaintiff Telebrands Corporation the amounts from Defendant BHSD Trading LLC's financial accounts within ten (10) business days of receipt of this Order.

Until Plaintiff Telebrands Corporation has recovered full payment of monies owed to it by Defendant BHSD Trading LLC, Plaintiff Telebrands Corporation shall have the ongoing authority to serve this Order on third party providers, including Amazon, PayPal, Meta, and Shopify, in the event that any new financial accounts controlled or operated by Defendant BHSD Trading LLC are identified. Upon receipt of this Order, third party providers, including Amazon, PayPal, Meta, and Shopify, shall within ten (10) business days:

- A. locate all accounts and funds connected to Defendant BHSD Trading LLC and/or its aliases and online marketplaces, including, but not limited to, The Garden Hose LLC and YMMP LLC, as well as any financial accounts connected to the information

listed in the Complaint, and any e-mail addresses provided for Defendant BHSD Trading LLC by third parties;

- B. restrain and enjoin such accounts or funds from transferring or disposing of any money or other of Defendant BHSD Trading LLC's assets; and
- C. release all monies, up to the above identified damages award, contained in Defendant BHSD Trading LLC's financial accounts to Plaintiff Telebrands Corporation as partial payment of the above-identified damages within ten (10) business days of receipt of this Order.

**ORDERS** that the Clerk shall serve a copy of this Order and the aforementioned Judgment on all parties in accordance with the Local Rules.

**IT IS SO ORDERED**

DATED: \_\_\_\_\_, 2024  
Albany, New York

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Mae. A. D'Agostino  
U.S. District Judge